

**COMMENTS ON DRAFT BULLETIN 160-98
CALIFORNIA WATER PLAN UPDATE**

GENERAL COMMENTS

**URBAN WATER CONSERVATION BEST MANAGEMENT PRACTICES AND
ADDITIONAL CONSERVATION OPTION**

Metropolitan recognizes water conservation is an important component of any resource plan. Therefore, Metropolitan is committed to full implementation of urban water conservation "best management practices", or BMPs, as stated in the memorandum of understanding of the California Water Conservation Coalition. However, Metropolitan is concerned with the estimates of water demand reductions used in the Draft Bulletin. The Draft Bulletin references the 1991 MOU Regarding Urban Water Conservation and assumes "full implementation" of BMPs for all urban users in the baseline projections. The final Bulletin needs to recognize that the MOU requires full implementation of all cost-effective BMPs by individual agencies.

Under the MOU, participating urban water agencies commit to use "good-faith efforts" to implement proven water conservation measures, develop new measures, and implement them as they become feasible. In return for this commitment, the environmental and public interest groups participating in the BMP development process have agreed that BMP implementation provides the best available methods for achieving water conservation and that the State Water Resources Control Board should only use reliable estimates of conservation savings developed through this process. As mandated by the MOU, the California Urban Water Conservation Council (CUWCC) was formed to develop methodology to quantify the water savings from identified BMPs, continually evaluate currently identified BMPs, and develop potential conservation practices. It is critical that DWR, in cooperation with the CUWCC, engages in evaluating the effectiveness of BMPs and devise realistic, credible estimates of water savings.

Metropolitan is concerned that the Draft Bulletin assumes water conservation measures beyond BMPs to reduce future water shortages. It is not clear on how the Draft Bulletin arrives at the estimated savings due to these potential BMPs. As Bulletin 160 has been an important source document for the State Water Resources Control Board in the Water Rights proceedings, Bulletin 160-98 should adhere to estimates provided by CUWCC.

RECYCLED WATER

It is stated in the Draft Bulletin that potential supply from water recycling is based on a 1995 DWR survey. We request that the survey data be included as an appendix to the final Bulletin to assure full public review of available production and cost data.

Summarized data in the Draft Bulletin from your 1995 survey for South Coast Region seems significantly different from Metropolitan's database for recycled water production and costs.

Some examples of differences are:

- The Draft Bulletin shows 80 projects currently producing 210,000 AF/Y of recycled water in Southern California, and those projects are expected to increase production to 330,000 AF/Y by the year 2020 (p. 7-108). Metropolitan's current database identifies 80 recycling projects producing a total of about 140,000 AF in FY 1995 and these projects are expected to produce about 234,000 AF/Y by the year 2020 (see attached table).
- The Draft Bulletin indicates that there is the potential to develop an additional 640,000 AF/Y of recycled water supply with a net "new water" yield of 556,000 AF/Y (p. 7-108; Table 7-32). Of the 556,000 AF/Y of new water from potential new recycling projects, 441,000 AF/Y can be developed at a cost less than \$500/AF (Table 7-32, p. 7-115). Metropolitan's survey in 1993 (see attached IRP Volume 3) identified the following costs for projects that were not operating or under construction at that time:

<u>Cost Range</u>	<u>Yield (AF/Y)</u>
< \$500/AF	92,000
\$500 to \$1000/AF	155,000
\$1000 to \$1500/AF	160,000
> \$1500/AF	60,000

The final Bulletin should also note that salinity impacts; failure to fully develop recycled water markets; and cost escalation due to construction constraints in urban areas could result in increased project unit costs from those identified in our 1993 survey.

We would like to obtain the data from DWR's 1995 survey such that the difference can be reconciled.

TABLES LISTING WATER SUPPLY AND DEMAND MANAGEMENT OPTIONS AVAILABLE TO REGIONS

While it is helpful to provide listings of projects and programs that various agencies are studying to augment supplies or manage demands, those projects inevitably represent a snap shot in the planning effort. We recommend that the tables be titled "List of Potential Water Supply and Demand Management Options" instead of "___ Region Options Comprehensive List".

DATA SOURCES AND EXPLANATION

There are frequent instances throughout the document where data or information is used with neither a source identified, nor enough explanation to understand where the data came from and how it should be used. The result is that the reader is frequently not given enough information to determine the validity of what is presented. While it is recognized that this is a very data-intensive document and it would

be difficult to identify all sources or explain each number, it would be beneficial, at a minimum, to reference sources that are not widely known to readers.

Some examples where additional information is needed include:

- The sources for the recycling projects and costs listed as options for each hydrologic region.
- The assumptions used in estimating water conservation savings with full implementation of the urban Best Management Practices (BMPs). Information could be included as an appendix to the final Bulletin.
- The basis for assuming current BMPs can effect reduction of 12 to 15 percent water use in the commercial, institutional and industrial sector (page 6-12).
- The basis for reducing commercial, institutional and industrial water use by 2 to 3 percent, in the South Coast Region, beyond what is expected to be achieved by the BMPs (page 7-98).
- The sources used for developing the costs for various conservation measures.

DATA INCONSISTENCIES

The Draft Bulletin contains a number of discrepancies and inconsistencies between data discussed in the text and tables, and from one table to another table. It is also difficult to follow how the water supply and demand management options are used to calculate the water budget with recommended options. Some examples are:

- Management options and augmentation options listed in Table 10-4 do not seem to agree with those in Table 10-3.
- It is unclear what options listed in Table 7-32 for the South Coast Region were used in Table 7-33.